

BR

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FUNDS IN THE AMOUNT OF ONE HUNDRED
THIRTY-ONE THOUSAND FIVE HUNDRED
DOLLARS, (\$131,500.00) in U.S. CURRENCY,
AND TWO HUNDRED TWENTY-TWO
AMERICAN EXPRESS TRAVELER'S CHECKS
IN THE AMOUNT OF ONE HUNDRED
ELEVEN THOUSAND DOLLARS, (\$111,000.00)

Defendant.

RICHARD LYNCH,

Claimant.

J.N. MAR 28 2008
MAR 28, 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

No. 08 C 1377

Hon. Matthew F. Kennelly
District Judge

Hon. Martin C. Ashman,
Magistrate Judge

NOTICE OF FILING

To: Daniel May, Esq.
Assistant United States Attorney
219 South Dearborn, 5th floor
Chicago, Illinois 60604

PLEASE TAKE NOTICE on the 28th day March, 2008, we filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division in the Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, the attached **Verified Claim**.

RICHARD LYNCH, Claimant
By and through his attorneys
KOMIE AND ASSOCIATES

By:


Stephen M. Komie

LAW OFFICES
KOMIE AND ASSOCIATES
One North LaSalle Street - Suite 4200
Chicago, Illinois 60602-4011
Telephone (312) 263-2800

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VERIFIED CLAIM

NOW COMES Claimant, RICHARD LYNCH, pursuant to the Supplemental Rule for Certain Admiralty and Maritime Claims C(6), and G(5) and demands restitution of the Defendant property and claims the right to defend this action. Based upon information and belief, Claimant has a bonafide ownership and/or possession interest in the Defendant property in that he is an owner and/or lawful possessor of the property. Further, Claimant has a property interest in the amount of \$131,500.00 in U.S. Currency and \$111,000.00 in American Express Traveler's Checks of the property which is the subject of this forfeiture action.

LAW OFFICES
Romie AND ASSOCIATES
One North LaSalle Street - Suite 4200
Chicago, Illinois 60602-4011
Telephone (312) 263-2800

Further, Claimant Lynch has assigned to his attorney Stephen M. Komie a fifty percent interest of the gross amount seized U.S. Currency and American Express Traveler's Checks. Said assignment to Claimant's attorney is for \$97,000.00 of the gross amount seized together with any interest to be paid or awards of attorney's fees.

Dated: MARCH 27 2008

Respectfully submitted,

By:



RICHARD LYNCH, Claimant

ASSIGNMENT

I, Richard Lynch, hereby assign, transfer, quit claim, and convey an amount \$97,000.00 of my interest in the \$242,500.00 of United States Currency and American Express Traveler's Checks seized by Chicago Police Department, Amtrak Police Department, Drug Enforcement Administration, and/or other law enforcement officers on October 9, 2007 at Union Station, Chicago, Illinois, without search warrant, Asset ID Nos. 08-DEA-490877 and 08-DEA-492161 to STEPHEN M. KOMIE.

DATED:

12/12/07


Richard Lynch



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Magistrate Judge

VERIFICATION

I, RICHARD LYNCH, Claimant, verify that the matters stated in the Verified Claim are true or based upon information and belief.


RICHARD LYNCH

KINGDOM OF ENGLAND)
CITY OF LONDON, S.S.

SWORN AND SUBSCRIBED
BEFORE ME THIS 27th
DAY OF March, 2008.

~~NOTARY PUBLIC~~

ELEANOR FOGAN
Notary Public of London, England
(My Commission Expires at death)

LAW OFFICES

KOMIE AND ASSOCIATES

One North LaSalle Street - Suite 4200

Chicago, Illinois 60602-4011

